

1 STEWART LAW GROUP
2 L. Marcel Stewart, Esq., CSB #250920
3 600 B Street, Suite 2050
4 San Diego, CA 92101
5 Tel: 619.702.4123
6 Email: LmsLaw@att.net

7 David Partovi, Esq., WSBA #30611
8 Attorneys for Ruben Galvan-Trujillo

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF WASHINGTON
(HON. MARY K. DIMKE)

11 UNITED STATES OF AMERICA) CASE NO. 4:22-CR-6041-MKD-1
12)
13 Plaintiff,)
14 v.) **DEFENDANT RUBEN GALVAN-**
15 RUBEN GALVAN-TRUJILLO (D1),) **TRUJILLO'S NOTICE OF**
16) **MOTION AND MOTION TO**
17 Defendant) **COMPEL DISCOVERY**
18) **Without Oral Argument**
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29 TO: VANESSA R. WALDREF, UNITED STATES ATTORNEY,
30 AND STEPHANIE A. VAN MARTER, ASSISTANT
31 UNITED STATES ATTORNEY:

32 COMES NOW the Defendant, Ruben Galvan-Trujillo, by and through his
33 attorneys of record, L. Marcel Stewart and David Partovi, and moves the Court to
34 enter an order granting Defendant Ruben Galvan-Trujillo's Motion to Compel
35 Discovery.

36 The instant motion is based upon the notice of motion, the attached
37 memorandum of points and authorities, the files and records in the above-
38 captioned matter, and any and all other materials that may come to this Court's
attention prior to or during the hearing of these motions.

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3 Dated: December 13, 2022
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5 Respectfully submitted,
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7 /s/ L. Marcel Stewart
8 L. MARCEL STEWART, CSB #250920

9 /s/David Partovi
10 DAVID PARTOVI, WSBA #30611

11 Attorneys for Mr. Galvan-Trujillo
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
(HON. MARY K. DIMKE)

UNITED STATES OF AMERICA)
) CASE NO. 4:22-CR-6041-MKD-1
)
Plaintiff,) CERTIFICATE OF SERVICE
v.)
)
RUBEN GALVAN-TRUJILLO (D1),)
)
Defendant.)
)
)
)

IT IS HEREBY CERTIFIED THAT:

I, L. MARCEL STEWART, am a citizen of the United States and am at least eighteen years of age. My business address is 600 W. Broadway, Suite 700, San Diego, California 92101.

I am not a party to the above-entitled action. I have caused service of the foregoing, Notice of Motion and Motion to Compel Discovery, on the parties of the case by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 13, 2022

/s/ L. Marcel Stewart
L. MARCEL STEWART